



Opportunities for Public Involvement

Public Comment Period

The U.S. EPA will accept written comments on the recommended alternative presented in this Proposed Plan for the Textile Road site during a 30-day comment period from November 14 to December 14, 1998. A copy of the Engineering Evaluation/Cost Analysis (EE/CA) and other site documents are available for review at:

Ypsilanti District Library
229 W Michigan
Ypsilanti, Michigan

Ypsilanti Civic Center
7200 South Huron Drive
Ypsilanti, Michigan

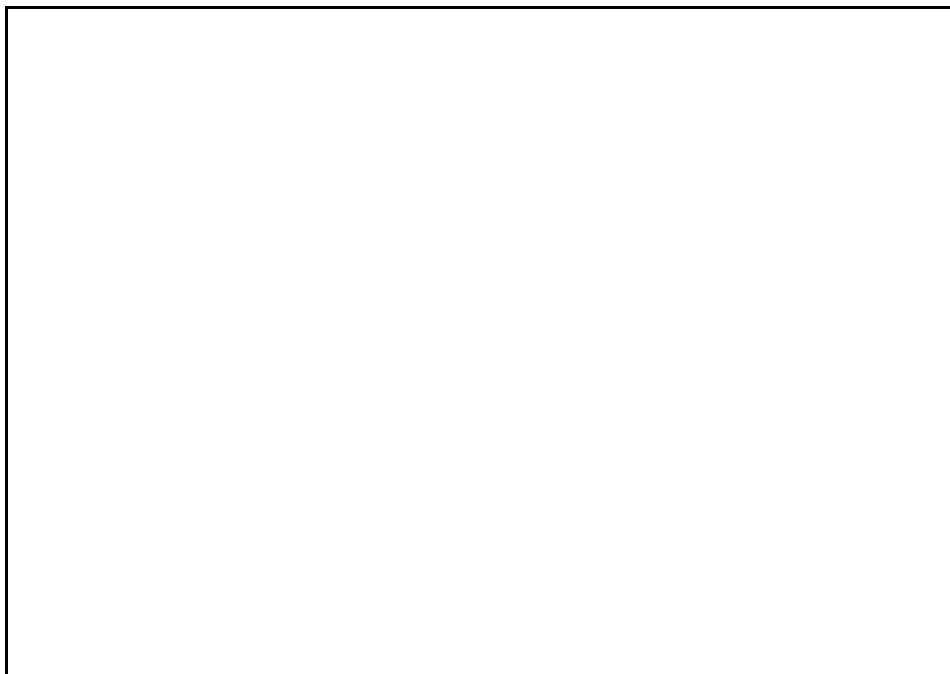
Public Meeting

The U.S. EPA will hold a public meeting to explain and answer questions about the EE/CA and this Proposed Plan for the Textile site. Oral and written comments will be accepted at a public meeting, which will be held:

Monday, November 23, 1998
7 p.m.
Ypsilanti Civic Center
7200 South Huron Drive
Ypsilanti, Michigan
(734) 484-0073

Revised Proposed Plan Textile Road Superfund Site

Ypsilanti, Michigan
November 1998



Introduction

This Revised Proposed Plan summarizes the cleanup alternatives that have been considered by the United States Environmental Protection Agency (U.S. EPA) for cleanup of hazardous contamination at the Textile Road **Superfund**¹ site. This Revised Proposed Plan reflects changes to the original Proposed Plan, released and dated August 1997. Revisions stem from consideration of comments submitted during the original 30-day comment period, from July 30, 1997 to August 28, 1997, and the 30-day extension of the comment period until September 27, 1997. Based on comments received during the comment period, including those from Ypsilanti Township and the Potentially Responsible Parties (PRPs), U.S. EPA has elected to modify the recommended alternative for cleanup at the Textile Road site. The modifications were made to reflect future land uses and current zoning requirements in Ypsilanti Township, and to reflect the more stringent cleanup criteria developed in the interim by the State of Michigan.

The alternatives were evaluated in an Engineering Evaluation/Cost Analysis Report and an Addendum (collectively, the EE/CA), developed specifically for the Textile Road site. The U.S. EPA evaluated the alternatives in the EE/CA report based on several factors, including the estimated amount of

¹ Words that appear in **bold** type are defined in a glossary on page 4.

contamination and the alternative's effectiveness in alleviating the potential health and ecological risks resulting from the presence of the contamination. The Revised Proposed Plan examines one modified alternative in addition to the alternatives from the original Proposed Plan. A detailed analysis of the alternatives can be found in the EE/CA Report at the local Information Repositories (see last page). It should be consulted for detailed information on the development and evaluation of the removal action alternatives.

The revised recommended alternative involves the excavation of on-site materials. Soils containing **polychlorinated biphenyl (PCB)** concentrations equal to or greater than 26 and less than 50 parts per million (ppm) will be disposed of in state-approved **Resource Conservation and Recovery Act (RCRA)** Subtitle D sanitary landfill. Soils containing PCB concentrations equal to or greater than 50 ppm will be disposed of in a **Toxic Substances Control Act (TSCA)** permitted landfill. The revised alternative also includes the excavation of soils containing PCB concentrations of equal to or greater than 1.2 and less than 26 ppm. These soils would be consolidated and covered in the northeast portion of the site. The U.S. EPA selected the State of Michigan's generic health risk-based soil cleanup criteria applicable for the current land use and zoning of the site. The excavation, transportation, and disposal of waste from the site will be conducted in compliance with all federal, state, and local regulations. In addition, to assure that any potential threat is thoroughly addressed, confirmation sampling of soils will be conducted after the completion of the cleanup. Long-term monitoring of groundwater and

restrictions on the future use (such as digging) of the covered consolidation area will be part of the operation and maintenance plan for the site.

Public input on the alternatives and the information supporting these alternatives is an important contribution to the process by which the U.S. EPA selects cleanup actions for Superfund sites. Based on new information or public comments, the U.S. EPA may modify the recommended alternative or select another alternative presented in this plan and/or the EE/CA Report. The public is encouraged to review and comment on the alternatives the U.S. EPA considered for the removal of contamination at the Textile Road site during a 30-day public comment period from November 14, 1998, to December 14, 1998. A summary of the U.S. EPA's responses to comments on the original Proposed Plan for Textile Road site is included on page 6. The complete Responsiveness Summary is available at the local Information Repositories or by contacting the U.S. EPA's Community Involvement Coordinator (see last page).

Background

The Textile Road site is a 62-acre residential/commercial property located at the southeast corner of Textile Road and Bunton Road in Ypsilanti Township, Washtenaw County, Michigan. The site is bordered to the north by Textile Road, to the west by Bunton Road, to the east by a Ford Motor Company property, and to the south by property zoned for residential purposes. Three ponds of varying sizes were formed as a result of gravel mining activity that took place at the site. The majority of the land is covered with heavy vegetation, including trees, shrubs and grass. A gravel road permits access to various parts of the site. A cinder block building exists near the north site entrance at Textile Road. Access to the site is restricted by a security fence which completely encloses the site. Entry to the site is controlled at two locked truck gates located on the northern and southern fence lines.

The site was originally used for agricultural purposes. Ford Motor Company sold the property in 1947. The new owner conducted

gravel mining at the site from approximately 1947 through September 1973. Attention was drawn to the site in March 1983 when a local resident informed the Michigan Department of Environmental Quality (MDEQ, formerly Michigan Department of Natural Resources) of the presence of 55-gallon drums at the site.

Site Investigations

Multiple site investigations were performed by the MDEQ during the mid-1980s. A number of 55-gallon drums were discovered on site. Samples collected from drums as well as from soils indicated the presence of PCBs. PCBs were also present in sediment samples. The drums were subsequently removed and disposed off-site.

The MDEQ referred the site to U.S. EPA in 1987. U.S. EPA took measures to secure the site. The site investigations revealed soil, sediment and groundwater contamination.

An Extent of Contamination (EOC) Study was performed by a contractor of the Potentially Responsible Parties (PRPs), pursuant to an administrative order issued by U.S. EPA. The EOC Study forms the primary basis for the development of the alternatives presented and evaluated in the EE/CA. In general, the EOC investigation identified exceedances of cleanup levels in the upper sand/fill materials located to the north and west of Pond 1. In this area of the site, soils up to eight feet in depth were found to be contaminated with PCBs. No exceedances of cleanup levels were observed in pond sediments during the EOC investigation. While PCBs were found to be above cleanup levels in one groundwater monitoring well, the evidence indicates that the PCBs are not mobile. The data is

available in the EOC Report, located in the information repository.

Summary of Site Risks

A risk assessment developed for the Textile Road site includes information on the risks to human health and the environment posed by on-site contamination. The risk assessment is included in the EE/CA report, and is available for review in the Administrative Record and Information Repository.

If not addressed by implementation of an appropriate response action, existing conditions at the Textile Road site may potentially present an imminent and substantial endangerment of the public health, welfare and the environment. Specifically, the potential endangerment may be the result of either or both of the following: a) Actual or potential exposure to hazardous substances by nearby populations, animals, or food chain; and/or b) High levels of hazardous substances in soils and groundwater that may migrate.

Summary of Alternatives

Based on the comments received during the first public comment period, the U.S. EPA has decided to recommend a revised version of Alternative 1A to address contamination at the Textile Road site. A detailed analysis of each of the alternatives is available for review at the Information Repository.

Revised Alternative 1A

The Revised Alternative 1A involves the excavation of on-site materials. Soils containing PCB concentrations of equal to or greater than 26 and less than 50 ppm will be disposed of in a state-approved RCRA Subtitle D sanitary landfill. Soils containing PCBs equal to or greater than 50

ppm will be disposed of in a TSCA-permitted landfill. Soils containing PCB concentrations of equal to or greater than 1.2 and less than 26 ppm will be consolidated in the northeastern portion of the site. This area will be covered with clean soil and vegetation or another approved soil cover system. The consolidation/covered area will not exceed the state's generic commercial subcategory IV standards. This Revised Alternative 1A allows for unrestricted residential development for approximately 52 acres in the southernmost portion of the site. The approximately 10-acre northern portion of the site will be open for commercial development, consistent with its current zoning. The U.S. EPA selected the State of Michigan's generic health risk-based soil cleanup criteria applicable for the current land use and zoning of the site. The excavation, transportation, and disposal of waste from the site will be conducted in compliance with all federal, state, and local regulations. Confirmation sampling of soils will be conducted after the completion of the cleanup. Long-term monitoring of groundwater and restrictions on the future use (such as digging) of the covered consolidation area will be part of the operation and maintenance plan for the site.

Alternative 1A

Off-Site Disposal: Alternative 1A was originally the U.S. EPA's recommended alternative for the remediation of on-site contamination. It consists of the excavation of on-site materials for disposal at one or more off-site RCRA and/or TSCA approved facilities. Soils containing PCBs in the range of 21 to 50 ppm would be disposed of in a state approved RCRA Subtitle D sanitary landfill. Soils with PCB contamination equal to or greater

than 50 ppm would be removed from the site for disposal at a TSCA permitted landfill. The excavation, transportation, and disposal of waste from the site will be in compliance with all federal, state, and local regulations.

Alternative 1B

On-Site Disposal: This alternative consists of constructing a soil containment vault to completely contain all contaminated soil. The soil vault would consist of low permeability clays and a liner. The liner would be constructed entirely above the water table and would include a leachate detection and leak system to monitor the vault's integrity. The vault would then be capped.

Alternative 2

No Action: This alternative allows the site to exist in its present condition. However, a monitoring program would be implemented at

the site to track groundwater quality and provide warnings if contaminants are detected above regulatory levels. This alternative alone does not provide a remedy for the uncontrolled or threatened releases of contamination. This alternative would not eliminate a direct contact threat and could aid in the migration of contaminants.

Alternative 3

Limited Action: This alternative relies on institutional controls, such as restricting site access, posting warning and no trespassing signs, and placing limitations on the future land uses of the site property. It limits the direct exposure threat to people from on-site contamination. Like Alternative 2, a monitoring program would be implemented at the site to track groundwater quality and provide warnings if contaminants are detected above regulatory levels. This alternative

would not remove the on-site contamination, nor would it control the possible migration of contaminants.

Alternative 4A

Capping: In addition to implementing the components of Alternative 3, this alternative involves employing a physical barrier over the contaminants. The purpose of the barrier is to minimize direct contact with contaminants. Capping incorporates placing a liner over the existing soil, and layering different types of soil over the liner. This alternative does not remove the contamination, but rather attempts to confine it.

Alternative 4B

Capping and Groundwater Cutoff Wall: In addition to employing the same methods utilized in Alternative 4A, this alternative includes the installation of a groundwater cutoff wall

Glossary

Polychlorinated biphenyls (PCBs) are a family of organic (carbon-containing) compounds that are extremely persistent in the environment; they do not break down into less harmful chemicals over a long period of time. PCBs may enter the food chain and be consumed by humans. If ingested, they are stored in the fatty tissues of animals and humans, and are not extracted with normal body waste. These compounds have no smell or taste and exist as either oily liquids or solids. Health effects that may result from exposure to PCBs include skin irritations (rashes and acne) and irritation to the nose and lungs. Long-term exposure to PCBs can cause liver damage and has been shown to cause cancer in laboratory animals.

Resource Conservation and Recovery Act (RCRA) is a Federal law that establishes a regulatory system for tracking hazardous wastes from the time the waste is generated to its final disposal. RCRA also requires safety standards for management of hazardous waste and sets standards for transportation, treatment, storage, and disposal of hazardous wastes.

Superfund is a Federal program that operates under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This law authorizes the Federal government to respond directly to releases (or threatened releases) of hazardous substances that may endanger public health, welfare, or the environment. The U.S. EPA is responsible for managing Superfund.

Toxic Substances Control Act (TSCA) is a Federal law that governs the manufacturing, importing, distributing, and processing of all toxic chemicals. TSCA requires that all such chemicals be inspected and approved by the U. S. EPA.

completely around the capped area. This would isolate the contamination and prevent migration. Any settlement or breach of the cap would likely add stress to the groundwater cutoff wall. Failure of the groundwater cutoff wall has the potential to release contamination to surrounding soils and groundwater.

Alternative 5A

Solidification/Stabilization and Capping: In addition to employing the same methods utilized in Alternative 4A, this method also incorporates the treatment of all excavated waste material by solidification/fixation. Under this alternative, all contaminated material would be excavated and treated, in batches, using solidification/stabilization, and replaced in the excavated area. A cap system, as outlined in Alternative 4A, would then be constructed over the treated material. The solidification/stabilization treatment procedure immobilizes the PCBs in the soil in a hard, high-strength matrix, resistant to water infiltration and leaching action.

Solidification/fixation uses a stabilizing agent, such as portland cement, to prevent direct exposure and the migration of contaminants.

Alternative 5B

Solidification/Stabilization and Capping, and Groundwater Cutoff Wall: In addition to employing the same methods utilized in Alternative 4B, this method also incorporates the treatment of all excavated materials by solidification/fixation, as stated in Alternative 5A.

Alternative 5C

Solvent Extraction, Stabilization/Solidification and Capping: In addition to employing the same methods utilized in Alternative 5A,

this method incorporates treatment by solvent extraction. Solvent extraction is a method of segregating the waste into 3 streams: solids, water and oil. Organic contaminants, such as PCBs, are concentrated in the oil stream. The oil extracted would be shipped off-site to an approved disposal facility. The water product would be treated if necessary, and disposed of at an approved facility. This process does not address inorganic contamination. The solids would require solidification/stabilization prior to backfill and capping on site.

Alternative 5D

Gas-Phase Chemical Reduction, Stabilization/Solidification and Capping: In addition to employing the same methods utilized in Alternative 5A, this alternative incorporates the treatment of the waste media by gas-phase chemical reduction (GPCR). The GPCR process first removes organic contaminants through thermal desorption--a process of heating the contamination in the presence of hydrogen to produce smaller and lighter hydrocarbons, which are further treated. It should be noted that at the time of the EE/CA this process was an emerging technology that had not been proven or utilized in a large scale application. This technology has still not been routinely applied to remediate sites. This process does not address inorganic contamination and would therefore require solidification/stabilization prior to being backfilled on site and capped.

Alternative 5E

Low Temperature Thermal Desorption, Solidification/Stabilization and Capping: In addition to employing the same methods utilized in Alternative 5A, this Alternative incorporates low temperature thermal desorption (LTTD). LTTD is a technology

developed as an ex-situ method of treating wastes containing organic contaminants (specifically, the more volatile compounds). Heating the waste materials causes volatilization of organic compounds, which are then separated from the non-hazardous materials for further treatment and disposal. LTTD requires that additional technologies be employed to address inorganic contamination, such as solidification/stabilization and capping prior to backfilling.

Alternative 5F

On-Site Incineration, Stabilization/Solidification and Capping: In addition to employing the methods utilized in Alternative 5A, this alternative incorporates the addition of on-site incineration. After processing, the waste would be incinerated on site with a portable incineration unit. The remaining solids would contain inorganic contamination that would require stabilization/solidification prior to being backfilled on site and capped.

Evaluation of Alternatives

The U.S. EPA used three criteria to compare the cleanup alternatives in the EE/CA and to recommend a practical cleanup alternative for the contamination at the Textile Road site. The evaluation criteria were:

Effectiveness: This criterion refers to the ability of a cleanup alternative to meet the objectives within the scope of the removal action, especially with regard to the protection of public health and the environment.

Implementability: This criterion considers the technical and administrative feasibility of implementing the cleanup alternative, such as the availability of goods and services.

Cost: This criterion considers

estimated capital, operation, and maintenance costs, as well as present worth costs. Present worth costs is an alternative's total cost over time in terms of today's dollars.

The U.S. EPA believes that Revised Alternative 1A represents the best balance of the three criteria. As a result, the U.S. EPA is recommending Alternative 1A, excavation and off-site disposal of contaminated materials. The MDEQ concurs with this cleanup approach. After the soil cleanup is completed, the U.S. EPA will require confirmation sampling of the soil and monitoring of the groundwater from the site to confirm the cleanup's effectiveness.

Summary of Proposed Plan Comments

The U.S. EPA prepared a Responsiveness Summary to address all of the concerns received from the community, Ypsilanti Township and the PRPs during the comment period on the original Proposed Plan, which was released in August 1997. Below is a summary of that document highlighting some of the major concerns expressed by the public. The U.S. EPA incorporated most of these concerns into this Revised Proposed Plan.

Several commenters requested the U.S. EPA extend the comment period, which was scheduled to end on August 28, 1997. The U.S. EPA granted a 30-day extension of the comment period to allow the public additional time to review and submit comments on the Proposed Plan.

Many commenters were concerned about zoning issues with regard to the recommended alternative in the Proposed Plan. The original Proposed Plan recommended alternative was to clean the site to meet industrial

standards, which are not suitable for unrestricted residential living. In an effort to coincide with Ypsilanti Township development plans, U.S. EPA has revised the recommended alternative. The revised alternative includes cleanup levels that are suitable for unrestricted residential development over the majority of the site. The smaller covered area in the northeast portion of the site will have a cleanup level to Michigan generic commercial subcategory IV standards (26 ppm).

Concerns regarding the appropriateness of the selected waste disposal facilities were raised during the comment period. Off-site disposal of the contaminated material with PCB contaminations equal to or greater than 50 ppm will take place at a TSCA permitted landfill, in compliance with U.S. EPA rules for off-site disposal. Off-site disposal of materials with contamination equal to or greater than 26 ppm and less than 50 ppm will be conducted at a RCRA Subtitle D sanitary landfill.

Commenters were concerned that groundwater contamination could potentially impact Ford Lake. A shallow groundwater table, which may have been impacted, flows northwesterly. It is being monitored and there is no reason to believe that contaminants have migrated off site. There is no off-site discharge of surface water. All storm water runoff flows into the on-site ponds. It is believed that once the contaminated materials are removed, the impact on groundwater will be eliminated. Groundwater will be monitored during the post cleanup period and, if necessary, further groundwater treatment will be conducted.

A commenter questioned how the U.S. EPA will ensure that the site poses no further risk once the cleanup is finalized. The U.S.

EPA is requiring a very comprehensive post-removal operation and maintenance program. This would require confirmation soil sampling, installation of monitoring wells and periodic groundwater testing, as well as care of any cover installed during the removal process.

Next Steps

The U.S. EPA will hold a public meeting to discuss the Revised Proposed Plan for the Textile Road site at *7 p.m. on Monday, November 23, 1998* at the Ypsilanti Civic Center, 7200 South Huron Drive, in Ypsilanti, Michigan.

The U.S. EPA will accept and consider all comments received at the public meeting and during a 30-day public written comment period from November 14, 1998 through December 14, 1998 before developing a final site cleanup plan. All comments received during the comment period will be addressed in a document called a responsiveness summary. The cleanup plan will be described in a final decision document that, along with the responsiveness summary, will be made public.

After the U.S. EPA selects a final cleanup plan for the Textile Road site, it will meet with the parties believed to be responsible for the site contamination and request that they conduct and fund the site cleanup. Following negotiations with these parties, the cleanup plan will be designed and implemented, either by the U.S. EPA, or by the responsible parties with U.S. EPA oversight. The PRPs have played an active role in developing the removal action at the Textile Road site. It is the full intention of the PRPs to participate in the proposed removal action and negotiate an agreement with U.S. EPA for the PRPs to implement the Proposed Plan.

Your input on the U.S. EPA's recommended cleanup plan for the Textile Road site is important. Public comments will assist the U.S. EPA in selecting the final cleanup plan.

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State _____ Zip _____

Textile Road Site Public Comment Sheet

Detach this page, fold on dashed lines, staple, stamp, and mail

Name _____

Address _____

City _____

State _____ Zip _____

Place
Stamp
Here

Denise Gawlinski
Community Involvement Coordinator
Office of Public Affairs (P-19J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Mailing List

If you did not receive this Fact Sheet in the mail, you are not on the U.S. EPA's mailing list for the Textile Road site. To add your name to the list to receive information concerning the site, please fill out this form, detach, and mail to:

Denise Gawlinski, Community Involvement Coordinator
Office of Public Affairs (P-19J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Name _____

Affiliation _____

Street Address _____

City, State _____ Zip _____

For More Information

The EE/CA Report, Responsiveness Summary, and other documents relating to the Textile Road site are available for review in two local Information Repositories. They have been established at the locations listed below:

Ypsilanti District Library
229 West Michigan
Ypsilanti, Michigan
(734) 482-4100

Ypsilanti Civic Center
7200 South Huron Drive
Ypsilanti, Michigan
(734) 484-0073

For Additional information about this site, you may contact the following U.S. EPA and MDEQ representatives:

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